James F. Kahn - 003063 Krystal M. Ahart - 029358 KAHN & AHART, PLLC BANKRUPTCY LEGAL CENTER™ 301 E. Bethany Home Rd., Suite C-195 Phoenix, AZ 85012-1266

Phone: 602-266-1717 Fax: 602-266-2484

Email: James.Kahn@azbk.biz Email: Krystal.Ahart@azbk.biz Attorneys for Creditor

## IN THE UNITED STATES BANKRUPTCY COURT

## FOR THE DISTRICT OF ARIZONA

In Re:		) In Proceedings Under Chapter 13
DUSTIN J. HAMBY,		) Case No.: 2:18-bk-03941-PS
	Debtor.	) ) )

## NOTICE OF OBJECTION TO POTENTIAL DISMISSAL

Courtney Hamby, Creditor, through the BANKRUPTCY LEGAL CENTER™, anticipating that the Debtor may file either a motion to dismiss or a notice of dismissal, gives notice to the Debtor, his counsel, and all parties in interest that Courtney Hamby objects to any such dismissal, and reserves the right to move convert the case to a case under Chapter 7 pursuant to 11 U.S.C. § 1307(c), and, without limitation, Marrama v. Citizens Bank of Massachusetts, 549 U.S. 365 (2007), and Rosson V. Fitzgerald, 545 F.3<sup>rd</sup> 764, predicated upon, *inter alia*, the Debtor's failure to fully disclose his assets and transactions in the Debtor's Schedules of Assets & Liabilities and Statement of Financial Affairs.

DATED this 22<sup>nd</sup> day of June, 2018.

KAHN & AHART, PLLC
BANKRUPTCY LEGAL CENTER™

/s/ James F. Kahn, SBN003063 Attorney for Creditor